

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

JAMES E. CRAIG, JR.,

Plaintiff

v.

CIVIL ACTION NO. 1:12cv1386  
CMH/JFA

EQUIFAX INFORMATION SERVICES, LLC., et al

Defendants

**PLAINTIFF'S EXPERT WITNESS DESIGNATION**

COMES NOW the Plaintiff, JAMES E. CRAIG, JR., by counsel, and for his expert witness designation, he states as follows:

The Plaintiff hereby designates Evan Hendricks of Privacy Times as his expert witness in this case. Mr. Hendricks is expected to testify that:

a. The Defendants reliance upon the automated e-OSCAR dispute system was inadequate to cause and complete a reasonable investigation of the Plaintiff's disputes.

b. Equifax has been on notice that its continued parroting of its creditor customers instead of conducting a substantive investigation is unreasonable to accomplish an effective investigation.

c. Equifax has been on notice that its procedures to avoid the mixing of consumer files and data are unreasonable to assure maximally accurate credit information.

d. A furnisher's reliance solely upon its own internal computer record, particularly as an assignee debt collector, is unreasonable process to conduct a substantive investigation.

e. The Plaintiffs' credit was damaged by the disputed credit information.

Mr. Hendricks' curriculum vitae is attached hereto as Exhibit "A".

Respectfully submitted,  
JAMES E. CRAIG, JR.,

/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of May, 2013, a true copy of the foregoing is being filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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/s/

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